

GERDA ZINNER, ET AL.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:23-cv-00535
)	
THE STATE OF TENNESSEE, ET AL.,)	Judge Aleta A. Trauger
)	
)	JURY TRIAL DEMANDED
Defendants.)	

Plaintiffs Gerda Zinner and Story VanNess, by and through counsel, respectfully request the Court extend their deadline for responding to the motion to dismiss filed by the State of Tennessee defendants¹ (D.I. 52) by 28 days, up to and including **September 19, 2023**. The original deadline is August 22, 2023. Plaintiffs also request the Court allow an enlargement of the twenty page limit for pretrial briefs contained in Section III.C.3 of the Court's Practice and Procedure Manual to twenty-five pages for their response brief to the motion to dismiss.

¹ Kristy Baddour, Randy Boyd, Jim Bryson, Terry Carroll, Michelle Consiglio-Young, Maryanne Durski, Holly Girgies, Patsy Hazelwood, Erin Johnson, Judi Knecht, Carter Lawrence, David Lillard, Local Education Insurance Committee, Jason Mumpower, State Insurance Committee, State of Tennessee, The, Tennessee Department of Finance and Administration, The University of Tennessee, Bo Watson, Jennifer White, Juan Williams. Referred to herein as the “State Defendants.”

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The State Defendants' motion to dismiss was filed on August 8, 2023. Due to the number of arguments raised, Plaintiffs require additional time to prepare their responses to State Defendants' Motion. No undue delay will be incurred by the Court or the Parties as a result of the requested extension because a case management order has not yet been entered. Further, the State Defendants' memorandum in support of their motion to dismiss was 25 pages in length, and granting Plaintiffs' motion to file a brief of equal length will allow the Plaintiffs to adequately respond to the arguments advanced by the State Defendants in their motion as well as provide parity between the parties.

For these reasons, Plaintiffs respectfully request that the Court grant their motion for an extension of time to respond to the State Defendants' motion to dismiss until September 19, 2023 and for an enlargement of five pages to the applicable page limits for their response.

Respectfully submitted this 18th day of August, 2023.

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2023, the undersigned filed the foregoing document using the Court's Electronic Court-Filing system, which sent notice of filing to the following counsel of record:

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